

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

FNU LNU,  
a/k/a "Glen Cooper,"  
a/k/a "Glendon Cooper,"

Defendant.

INFORMATION

19 Cr.

19 CRM 847

COUNT ONE  
(Access Device Fraud)

The United States Attorney charges:

1. From at least in or about April 2017 up to and including at least in or about August 2019, in the Southern District of New York and elsewhere, FNU LNU, a/k/a "Glen Cooper," a/k/a "Glendon Cooper," the defendant, knowingly, and with intent to defraud, as part of an offense affecting interstate and foreign commerce, did effect transactions, with one and more access devices issued to other persons, to receive payment and other things of value during a one-year period the aggregate value of which is equal to and greater than \$1,000, to wit, the defendant fraudulently obtained and used debit cards and electronic benefits transfer cards issued to other persons pursuant to the New York State Unemployment Insurance Fund, Supplemental Nutrition Assistance Program ("SNAP"), and Safety Net Assistance Program.

(Title 18, United States Code, Sections 1029(a)(5) and 2.)

**COUNT TWO**  
**(Theft of Government Funds)**

The United States Attorney further charges:

2. From at least in or about August 2017 up to and including at least in or about September 2018, in the Southern District of New York and elsewhere, FNU LNU, a/k/a "Glen Cooper," a/k/a "Glendon Cooper," the defendant, did embezzle, steal, purloin, and knowingly convert to his use and the use of another, and without authority did sell, convey, and dispose of records, vouchers, money, and things of value of the United States and a department and agency thereof, to wit, the United States Department of Health and Human Services and the United States Department of Agriculture, which exceeded the sum of \$1,000, and did receive, conceal, and retain the same with intent to convert it to his use and gain, knowing it to have been embezzled, stolen, purloined and converted, to wit, the defendant fraudulently obtained Medicaid and SNAP benefits intended for other persons.

(Title 18, United States Code, Sections 641 and 2.)

**FORFEITURE ALLEGATION**

3. As a result of committing the offenses alleged in Count One of this Information, FNU LNU, a/k/a "Glen Cooper," a/k/a "Glendon Cooper," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code,

Sections 982(a)(2)(B) and 1029(c)(1)(C), any and all property constituting, or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offense, and any and all personal property used or intended to be used to commit said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

4. As a result of committing the offenses alleged in Count Two of this Information, FNU LNU, a/k/a "Glen Cooper," a/k/a "Glendon Cooper," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982, 1029; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(18 U.S.C. §§ 1029, 641, and 2.)

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GEOFFREY S. BERMAN  
United States Attorney

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